

RE: Babcock, et al. v State of Michigan, et al. - Defendant DWJBA's First Set of Discovery Requests to Plaintiffs Babcock and Maddox

From Michael Bartnik, Attorney <michaelbartnik@protonmail.com>
To Gregory N Longworth <glongworth@clarkhill.com>, Gaydos, Lisa <lgaydos@clarkhill.com>
CC Elizabeth Abdnour (liz@education-rights.com) <liz@education-rights.com>, Renee Stromski <renee@awlawohio.com>, Magy, Paul S. <pmagy@clarkhill.com>
Date Tuesday, October 15th, 2024 at 11:02 AM

Lisa, et al:

Forwarding the below, per Greg's out of office until October 21, 2024 message.

Thank you.

MWB

On Tue, Oct 15, 2024 at 10:57 AM, Michael Bartnik <michaelbartnik@protonmail.com> wrote:

Thank you, we are finishing the final edits and anticipate delivering to you this afternoon the documents requested of both Jill Babcock and Marguerite Maddox and the Answers of Jill Babcock to Interrogatories. Marguerite Maddox' Answers to Interrogatories are also being targeted for delivery today, though that item may not be complete until tomorrow.

MWB

On Tue, Oct 15, 2024 at 10:04 AM, Longworth, Gregory N. <glongworth@clarkhill.com> wrote:

Michael:

On August 19, 2024, DWJBA served on Plaintiffs Babcock and Maddox admission requests, interrogatories, and document requests. The answers to each were due on Sept. 18. On Sept. 11, you sent us an email requesting an additional three weeks—until Oct. 9—to respond to the discovery requests. Later that day, we responded that we were unwilling to agree to a three-week extension, laying out our reasons; instead, we agreed to a two-week extension—Oct. 2—with three conditions. Yet later that day, you requested that we agree to Oct. 4 as the due date. We reluctantly agreed to your request for the Oct. 4 date.

On Oct. 4, as agreed, you served Plaintiff Babcock's and Maddox's responses to the admission request, but failed to serve the responses on that date. Your email attaching admission responses (below) stated that the interrogatory answers and document-requests responses were not yet ready. You promised we would have them by Friday, Oct. 11, or Monday, Oct. 14, at the latest. We did not respond to that additional request, which would make the responses due later than your original three-week request, which we rejected as unacceptable.

Now the Oct. 11 and 14 dates have passed and we still haven't received the responses.

If we don't receive full and complete responses promptly, we will have no option but to file a motion to compel discovery.

Gregory N. Longworth

Attorney at Law

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From: Michael Bartnik <michaelbartnik@protonmail.com>

Sent: Friday, October 11, 2024 11:57 AM

To: Bostice, Antoinette T. <abostice@clarkhill.com>; Magy, Paul S. <pmagy@clarkhill.com>; Longworth, Gregory N. <glongworth@clarkhill.com>

Cc: nosej@detroitmi.gov; Albro, Lisa (AG) <albro@michigan.gov>; Pendrick, Kimberly (AG) <pendrickk@michigan.gov>; Richards, Margaret (AG) <richardsm1@michigan.gov>; Drysdale-Crown, Cassandra (AG) <drysdaledcrown@michigan.gov>; Melvin B. Hollowell <mbh@millerlawpc.com>; E. Powell Miller <epm@millerlawpc.com>; jesse.halfon@detroitmi.gov; jjernigan@waynecounty.com; James Heath <jheath@waynecountymi.gov>; Angela L Baldwin <alb@millerlawpc.com>; García, Lawrence T. <Garcia@millercanfield.com>; Bierlein, Kyle <Bierlein@millercanfield.com>; Elizabeth Abdnour (liz@education-rights.com) <liz@education-rights.com>; Renee Stromski <renee@awlawohio.com>

Subject: Re: Babcock, et al. v State of Michigan, et al. - Defendant DWJBA's First Set of Discovery Requests to Plaintiffs Babcock and Maddox

[External Message]

Dear Paul and Greg,

As predicted below, we anticipate having our remaining responses and objections to you Monday October 14, 2024.

Thank you for your anticipated courtesy in this regard.

Michael W. Bartnik

Attorney at Law

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On Friday, October 4th, 2024 at 3:40 PM, Michael Bartnik <michaelbartnik@protonmail.com> wrote:

Dear Paul and Greg, et al:

- Attached are our Objections and Answers to your Requests for Admissions.
- We are still preparing our objections and answers to the Interrogatories and to the Request for Production, and we anticipate having those ready by next Friday, or the following Monday.
- Accordingly, we request a further extension of the deadline.
- Please note, I have removed or added some email addresses above to make sure these are going to the attorneys of record in this case: if I have omitted any in error, please let me know.
- Thank you.

Michael W. Bartnik

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On Monday, August 19th, 2024 at 1:42 PM, Bostice, Antoinette T. <abostice@clarkhill.com> wrote:

Good Afternoon,

Attached please find Defendant Detroit-Wayne Joint Building Authority's First Set of Discovery Requests to Plaintiff Jill Babcock and Plaintiff Marguerite Maddox.

I have also attached these documents in Word format for your use.

Thank you and have a great day!

Antoinette Tyler

Legal Administrative Assistant

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